



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Air Quality Control – Consolidated Plan Approvals
LPA/CPA Consolidation of Previously Issued Plan Approvals (BWP AQ 33)
Instructions & Supporting Materials

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Introduction

MassDEP *Permit Applications*, as well as *Instructions & Support Materials*, are available for download from the MassDEP Web site at <http://www.mass.gov/eea/agencies/massdep/air/approvals/air-plan-approval-applications.html> in two file formats: Microsoft Word™ and Adobe Acrobat PDF™. Either format allows documents to be printed.

Instructions & Support Materials files in Microsoft Word™ format contain a series of documents that provide guidance on how to prepare a permit application. Although we recommend that you print out the entire package, you may choose to print specific documents by selecting the appropriate page numbers for printing.

Permit Applications in Microsoft Word™ format must be downloaded separately. Users with Microsoft Word™ 97 or later may complete these forms electronically.

Permitting packages in Adobe Acrobat PDF™ format combine *Permit Applications* and *Instructions & Support Materials* in a single document. Adobe Acrobat PDF™ files may only be viewed and printed without alteration. *Permit Applications* in this format may not be completed electronically.



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Permit Fact Sheet

1. What is the purpose of the consolidated plan approval?

The purpose of issuing the consolidated plan approval is to enhance the compliance efforts of the owner/operator of a regulated facility. In many instances, there are numerous applicable requirements for an emission unit or pollutant at a facility; and at times there can be duplicative requirements. An owner or operator now has the option to apply to the Department to streamline their facility's emission unit's requirements.

2. Who must apply?

An application for a consolidated plan approval under 310 CMR 7.02(12) is voluntary.

3. What other requirements should be considered when applying for these plan approvals?

None.

4. What is the application fee?

LPA/CPA Consolidation	Consolidated Plan Approval	N/A
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5. Where do I send my completed consolidated plan application?

Your completed **consolidated** plan application must be submitted in **duplicate** to the appropriate MassDEP Regional Office (<http://www.mass.gov/eea/agencies/massdep/about/contacts/>) for review and, if merited, approval. Upon approval, MassDEP will stamp the second copy of the **consolidated** plan application and return it to you so both you and the agency will have identical copies of the **consolidated** plan approval.

6. What is the annual compliance fee?

The annual compliance assurance fee is dependent on the facility wide potential emissions. Please consult 310 CMR 4.03 (Table 4.03) for more information. If you fail to pay the annual compliance fee your permit could be suspended or revoked.

7. How long is the consolidated plan approval in effect?

The consolidated plan approval is in effect until the emission unit(s)/facility covered by this action is substantially reconstructed or altered. If the owner or operator wishes to include additional emission units in the issued consolidated plan approval, (s)he must apply for a new consolidated plan approval. If a new applicable requirement is identified for an emission unit/facility currently in the consolidated plan approval, the owner shall submit consolidated plan application pursuant to 310 CMR 7.02(12).

8. How can I avoid the most common mistakes made in applying for this consolidated plan approval?

- Answer all questions on the application form and indicate "N/A" (not applicable) where appropriate.
- Submit two copies of the application to the regional office for review.
- Submit one copy of the MassDEP Transmittal Form to:

Department of Environmental Protection
P. O. Box 4062
Boston, MA 02211



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9. What are the regulations that apply to these plan approvals? Where can I get copies?

These regulations include, but are not limited to:

- Air Pollution Control Regulations, 310 CMR 6.00 to 8.00.
- Timely Action and Fee Provisions, 310 CMR 4.00.
- Administrative Penalty Regulations, 310 CMR 5.00.

These may be purchased at:

State House Bookstore
Room 116
Boston, MA 02133
617-727-2834

State House West Bookstore
436 Dwight Street
Springfield, MA 01103
413-784-1376

See also: <http://www.mass.gov/eea/agencies/massdep/air/regulations/air-and-climate-regulations.html>



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Consolidated Plan Approval Application

Instructions and guidance for completing a consolidated plan approval application are provided in this document.

Section A
Facility Information

Facility

Facility Name:	The actual facility name, not the corporate or other name
Street Address:	The physical location of the facility
City/Town, State, Zip:	City name, State and nine-digit zip code (if known) of the facility location
Mailing Address:	Mailing address for the facility, if different from physical location
City/Town, State, Zip:	City name, State and nine digit zip code (if known) of the mailing address

Owner & Facility Contact Person

Owner:	Name of individual or corporation that owns facility
Contact Person:	<i>On site person responsible</i> for completing the application or a person at the facility familiar with the application and plant operations.
Title:	Title/position of contact person.
Telephone Number:	Area code, number and any extension of the person named as contact.
Email Address:	Optional

Standard Industrial Classification Code(s) (SIC):

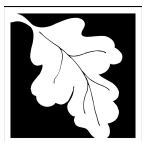
List the four (4) digit SIC code that apply to the facility. SIC codes may be found, among other places, on Federal Tax Returns.

North American Industrial Classification Code (NAICS):

List the six (6) digit NAICS code that applies to the facility. <http://www.naics.com/search.htm>

Facility and Proposed Consolidation and Streamlining Description:

Provide a brief description, in the space provided, of the operations to be streamlined or whose applicable requirements are to be consolidated into one plan approval.



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Consolidating & Streamlining Applicable Requirements

310 CMR 7.02(12) allows an owner/operator to streamline the applicable requirements of an emission unit, and to consolidate the applicable requirements from numerous existing plan approvals or regulations into one enforceable document. These distinct but related concepts are described here.

Consolidating all or part of facility's applicable requirements into one enforceable document is allowed for by 310 CMR 7.02(12). Over the years, an owner/operator of a facility applies for, and receives numerous plan approvals, emission control plans or regulations are adopted which apply to the associated emission units. For ease of compliance, an owner/operator may apply to the MassDEP for a consolidated plan approval, which would contain all the applicable requirements for the emission units proposed to be included.

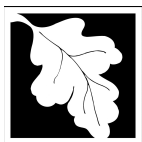
Where multiple requirements apply to a single emission unit, 310 CMR 7.02(12) also allows the owner/operator to propose the more stringent of the requirements as the sole means of ensuring compliance with the other requirement(s). To make use of this opportunity, it is necessary to identify the applicable requirements, whose terms of measurement may or may not be the same, and to describe how the most stringent requirement is stricter than those to be subsumed in it. During this process, the owner/operator may find that a "hybrid" may be the best way to reflect the different parts of two requirements when subsuming an applicable requirement for an emission unit. For example, one previous plan approval term might have the stricter of two emission limits applicable to a particular emission unit, while another might have a less stringent emission limit but a better monitoring scheme. A "hybrid" requirement would partake of the stricter emissions limit and the better monitoring scheme, thereby making effective use of both applicable requirements.

Section B
Emission Unit Overview

Provide a listing of the emission units to be streamlined or consolidated. A brief description of the emission unit and the associated emission release point (i.e. specify the stack (#1) or general ventilation).

Example:

Emission Unit #	Stack #	Description
1	1	CB400 Boiler
2		CB200 Boiler
3	general ventilation	Heidelberg 28x40 Printing Press



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Section C
Applicable Requirements

Requirement(s) or Permit Term(s) to be “Streamlined” - In these columns, describe, cite, and explain the obsolete, unnecessary, or duplicative requirements to be addressed under these two concepts.

Emission Unit: Duplicate the listing from Section B
Pollutant: Provide the pollutant being regulated
Citation: Provide the citation in the underlying plan approval, state or federal regulation, or other MassDEP document

Section D
Proposed Terms & Conditions

Emission Unit: Duplicate the listing from Section B
Description: Describe the applicable requirement (e.g. old permit term, underlying regulation etc.)
Reason: Indicate why the requirement or term is to be re-written, or subsumed

Proposed Replacement for the Applicable Requirements:

In the space provided, or on a separate sheet of paper, the owner/operator proposes the most stringent emission limit and monitoring schematic for the emission unit and describe how the most stringent requirement is stricter than those to be subsumed in it, if such comparisons of strictness are not readily apparent in looking at the requirement.

Section E
Implementation schedule

There may be instances where the owner/operator requires more time to implement any new monitoring/compliance approach relevant to a consolidated plan approval.

Check the appropriate box to indicate whether or not a schedule is being proposed. The current record keeping, monitoring, and reporting requirements (applicable requirements) shall continue to apply until the new monitoring/compliance approach is operational.

Section F
Certification

Any application form, report, or compliance certification submitted pursuant to 310 CMR 7.00 shall contain certification by a responsible official of truth, accuracy, and completeness in accordance with 310 CMR 7.01(2). The appropriate responsible official must sign the application form even where a third party was hired to complete the application.



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Completeness Checklist

Application Completeness Checklist

- ☐ The MassDEP Transmittal Form is completed:
<http://www.mass.gov/eea/agencies/massdep/service/approvals/transmittal-form-for-payment.html>
- ☐ All applicable questions have been completed or N/A has been inserted where appropriate.
- ☐ A signature of the appropriate responsible official has been included even if an agent has been hired to complete the application. See definitions in 310 CMR 7.00.

To submit the application package:

- ☐ Checklist items have been completed.
- ☐ Send two copies of the application package along with one copy of the MassDEP Transmittal form to:

Department of Environmental Protection
_____ * Regional Office
Air Quality Control

*Find your region: <http://www.mass.gov/eea/agencies/massdep/about/contacts/>

- ☐ Send fee of:

Not applicable at this time.

in the form of check or money order made payable to *Commonwealth of Massachusetts*, along with one copy of the MassDEP Transmittal Form to:

Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211